



William Downes – Associate  
200 Vesey Street, 24th Floor  
New York, NY 10281  
P: (212) 595-6200 | F: (212) 595-9700  
wdownes@mizrahikroub.com  
www.mizrahikroub.com

April 19, 2022

**VIA ECF**

The Honorable Lewis J. Liman  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Tavarez-Vargas v. Kiierr International, LLLC, Case No. 1:21-cv-9911 (LJL)*

Dear Judge Liman:

We represent plaintiff Carmen Tavarez-Vargas (“Plaintiff”) in the above-referenced ADA website-accessibility class action and write in response to the Court’s April 5, 2022 Order to respectfully notify the Court that Plaintiff has had no contact with Defendant. Accordingly, Plaintiff respectfully requests that the Initial Pretrial Conference, currently scheduled for April 26, 2022 at 12:30PM, be adjourned and that Plaintiff be allowed an additional 30 days to move for Default Judgment. This is Plaintiff’s second request for an adjournment.

Respectfully submitted,  
/s/ William Downes  
William Downes, Esq.

Cc: All Counsel of Record (via ECF)

Plaintiff’s request is GRANTED. Plaintiffs shall file a motion for default judgment by May 20, 2022 and shall serve the motion on Defendant. Defendant shall file any opposition to the motion by June 23, 2022. The Court will hold a telephonic default judgment hearing on June 30, 2022 at 2 p.m. The parties should dial into the Court’s teleconference line at 888-251-2909, Access Code 2123101#, and follow the necessary prompts. Plaintiff is directed to serve a copy of this Order on the Defendant.

SO ORDERED.

A handwritten signature in black ink, appearing to read "Lewis J. Liman".

LEWIS J. LIMAN  
United States District Judge

4/20/2022